EXHIBIT A

DECLARATION OF ANDREAS ALKIVIADES ANDREOU

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5 l	
	Attorneys for Defendant
6	Aylo Premium Ltd (formerly known
	as MG Premium Ltd, and doing
7 l	business as Digital Playground)
	g

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

MELISSA HUTCHISON aka PHOENIX MARIE, an individual,

Plaintiff,

v.

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ETHICAL CAPITAL PARTNERS, a foreign entity; AYLO PREMIUM LTD., a foreign corporation; DM PRODUCTIONS, a foreign entity; DIGITAL PLAYGROUND, a foreign entity; MIND GEEK USA INCORPORATED, a foreign entity; MG PREMIUM LTD, a foreign entity; DM PRODUCTIONS, a foreign entity; DIGITAL PLAYGROUND, a foreign entity; DANNY MARTIN aka DANNY D, an individual,

Case No. 2:24-cv-00673-GMN-BNW

DECLARATION OF ANDREAS ALKIVIADES ANDREOU IN SUPPORT OF AYLO PREMIUM LTD'S MOTION TO DISMISS PLAINTIFF'S SECOND AMENDED COMPLAINT

Defendants.

I, Andreas Alkiviades Andreou, hereby declare as follows:

1. I am employed by Aylo CY Holdings Ltd as Director of Corporate Finance, a position which I have held since 2013. I have also served as a Class A manager (the equivalent of a director) for Aylo Holdings S.à.r.l. since 2016. Through my employment and experience, I am familiar with the corporate structure and operations of Aylo Premium Ltd (which was formerly known as MG Premium Ltd) ("Aylo"). Almost every day, as part of my regular job responsibilities, I deal with issues involving the corporate structure of Aylo in some capacity.

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2.	Unless	otherwise	stated,	I make	this	declaration	of the	following	facts	from	m
direct, persona	al knowl	edge, and v	would c	ompeter	ıtlv t	estify thereto	o if call	ed as a wit	ness.		

- I have reviewed the Second Amended Complaint ("SAC") filed in the instant 3. action and I am familiar with the allegations made therein.
- Aylo is a limited liability company organized and operating under the laws of the Republic of Cyprus, having its head office at 195-197 Old Nicosia-Limassol Road, Block 1 Dali Industrial Zone, Cyprus.
- 5. Aylo does not have any offices or employees in Nevada or in the United States and is not registered to do business in Nevada or any other state in the United States. Aylo does not have United States-based operations, a United States mailing address or phone number, United States bank accounts, designated agents in the United States, or United States employees. Aylo has never filed a lawsuit in Nevada (or anywhere else in the United States for that matter).
- 6. Aylo entered into a Performer Services Agreement with Plaintiff Melissa Hutchison, dated October 1, 2023. The Performer Services Agreement was negotiated, pursuant to an intercompany services agreement, by a corporate affiliate of Aylo in Montreal, Canada and signed by Aylo from Cyprus. A true and correct copy of the Performer Services Agreement is attached as Exhibit A to the Notice of Filing Redacted Performer Services Agreement (ECF No. 46).

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 26th day of March, 2025.

/s/ Andreas Alkiviades Andreas Alkiviades Andreou